

L0450305002 – Edgar
Midwest Body Corporation
IL0002325330
SF/HRS

EPA Region 5 Records Ctr.



369969

CERCLA Abbreviated Preliminary Assessment



**Illinois Environmental
Protection Agency**

Bureau of Land
Federal Sites Remediation Section
Site Assessment Unit

CERCLA Abbreviated Preliminary Assessment

For

Midwest Body Corporation

Paris, Illinois

IL0002325330

**PREPARED BY:
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF LAND
OFFICE OF SITE EVALUATION**

August 28, 2003

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1.0 Introduction

On October 18, 2002 The Illinois Environmental Protection Agency's (Illinois EPA) Office of Site Evaluation was tasked by United States Environmental Protection Agency (U.S. EPA) Region V to conduct an Abbreviated Preliminary Assessment (APA) at the Midwest Body Corporation site in Paris, Illinois. The property is located at 2109 South Central Avenue, Paris, Edgar County, Illinois. The site is specifically located in the N1/2 of the SW ¼ of S12, T13N, R12W. The latitude is 39 degrees 35' 37.6" and the longitude is 87 degrees 41' 55.2". The site location is shown in Figure 1 of this report. The APA is performed under the authority of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) commonly known as Superfund.

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR Part 300) requires a Preliminary Assessment be performed on all sites entered into the Comprehensive Environmental Response, Compensation, and Liability System (CERCLIS).

An Abbreviated Preliminary Assessment (APA) will meet the objectives of a Preliminary Assessment. The determination to conduct an APA has been made due to the following:

- 1) A site has been unnecessarily listed in CERCLIS either because it is not eligible or because it could be deferred to another program;
- 2) Available information allows EPA to make an early decision to undertake a combined PA/SI, an SI, or another Superfund investigation.
- 3) A No Further Remedial Action (NFA) decision can be made without

completing a full Preliminary Assessment.

If the determination is made that the site is NPL caliber, the site will progress through the Superfund process. A sampling plan to accommodate removal and site assessment needs, as well as initial remedial needs will be developed during future investigations. The need for site sampling will be based on a reasonable understanding of the site in order to assure that adequate data will be collected for the removal assessment and the preparation of the Hazard Ranking System (HRS) score. The need for the initial sampling for the remedial investigation will also be considered. Upon completion of the data gathering, there will be a determination of whether the site should be forwarded within the Superfund process, either through the remedial or removal programs. Based on the preliminary HRS score and removal program information, the site will then either be designated as No Further Action (NFA), or carried forward as an NPL listing candidate.

2.0 Site Background

2.1 Site Description

Midwest Body Corporation is a former manufacturing facility located at 2109 South Central Avenue in Paris (population 9,016), Edgar county, Illinois at the south end of town west of Illinois Route 1. The property consists of approximately 22.3 acres and is located in the N1/2 of the SW ¼ of S12, T13N, R12W. The latitude is 39 degrees 35' 37.6" and the longitude is 87 degrees 41' 55.2". The site location is shown on Figure 1 of this report.

Illinois EPA conducted a site visit in July 2003 . The property is entered through a gate off of South Central Avenue. The land is flat and during a walk through and later

drive around the property no apparent offsite drainage pathway could be determined. The western half of the property is a vacant field that was cleared of brush and debris during a removal action by U.S. EPA in 1998 and presently is covered with tall weeds and grasses. The eastern portion consists mainly of buildings and paved areas. Access is limited to the gated area and the property is surrounded by a high chain link fence and no evidence of trespass was noted. A Pennsylvania Central Railroad spur enters the property on the southeast side and follows the south property boundary and then veers to the northwest at approximately the center of the site. The eastern portion currently has approximately seven acres under roof and approximately five acres used for parking. It also has an active business, Robert Morgan, Inc. that is involved in the formulation of fat-based animal food supplements that are sold to processors. Robert Morgan, Inc. employees 28 people.

According to the Edgar County Tax Assessment office the property is presently in two parcels with separate mailing addresses: the west parcel consists of 9.95 acres and the east parcel 12.03 acres. The east parcel is an active facility currently owned by Robert Morgan, Inc., and is involved in the formulation of various animal supplements. The City of Paris owns a small .32 acre portion of the east parcel which is a part of the former railroad spur. The west parcel is vacant with no buildings and is the area where the wastes were discovered and removed and is owned by RDM Inc. Robert Morgan is the owner of both parcels.

Nearby land use consists of private residences north of the site across an alley; by the closed Foley Lumber Co., Inc. property and farmland on the west; by farmland and Cadilac Products on the south; and South Central Avenue on the east. There are no

municipal wells located within a four mile radius of the site. The nearest private wells are located in the rural areas with the nearest one located approximately three- fourths of a mile southwest. The city of Paris obtains its drinking water from a surface water intake approximately three miles north located in Twin Lakes. The nearest wetland is located approximately .7 miles south of the site and consists of approximately three-fourths of an acre. There are no other known sensitive environments in the vicinity of the property. The nearest school is located approximately one-half mile north of the site.

The surficial geology consists of Drummer and Raub soils. The unconsolidated material below consists of glacial till of Wisconsin, Illinoian and Kansan ages. The total thickness of the unconsolidated deposits in the Paris area are commonly in excess of 100 feet. The bedrock below the glacial till consists of the Mattoon Formation of Pennsylvanian age which is approximately 100 feet thick. The formation consists of thin limestones, coals, fissle shales, underclays, thick grey shales and several sandstones. In the Paris area the most prominent member is the Merom Sandstone Member which varies from 10 to 40 feet in thickness.

The local unconsolidated aquifers are not considered to be good producers for a public water supply source. As mentioned above, the city of Paris does not obtain its drinking water from regional groundwater. Groundwater is used in rural areas and draw from thin sandy units at depth of approximately 30 and 150 feet below ground surface. The nearest residential well is approximately three-fourths of a mile southwest of the site.

2.2 Site History

The property was purchased by the McGuire-Cummings Manufacturing Co. in

July 1907 from T.A. Foley. It is believed that the oldest building on the property was constructed in 1908 to manufacture streetcars and sweepers and that other buildings were built over the years with the most recent constructed in the 1960's. The company reorganized in 1925 and changed its name to the Cummings Car and Coach Company. During the Second World War the company manufactured bomb skids, troop carriers and other military equipment. In 1945 the property was leased to Electrographic Corporation until 1980, when they purchased the site from Ramdel Reality Corp. Ramdel had bought the property in 1947 from a successor to the Cummings Car and Coach Company. Midwest Body Corporation purchased the property from Electrographic Corporation in 1985. The company was involved in the fabrication of flatbed and utility truck bodies. In July, 1985 the company was purchased by Lanny Passaro and John Jeffers. The company ceased operations in July 1993 after a bank foreclosed on it. Midwest Body Corporation was formally dissolved in 1994. The eastern portion of the site presently used by Robert Morgan, Inc., an active business. The western portion has been dormant since the removal activity.

Activities that were conducted by Midwest Body Corporation during the manufacturing process included parts stamping and cutting, welding, parts washing, wood treatment, painting, and equipment repair and maintenance. Resource Conservation and Recovery Act (RCRA) hazardous wastestreams generated included waste paint materials. Special (Nonhazardous) wastes included paint sludge, paint booth filters, water soluble parts washer rinsates, welding cooling water and waste oil.

According to the Edgar County Tax Assessment office the property is presently in two parcels with separate mailing addresses: the west parcel consists of 9.95 acres and

the east parcel 12.03 acres. The east parcel is an active facility currently owned by Robert Morgan, Inc., and is involved in the formulation of various animal supplements. The City of Paris owns a small .32 acre portion of the east parcel which is a part of the former railroad spur. The west parcel is vacant with no buildings and is the area where the wastes were discovered and removed and is owned by RDM Inc.

2.3 Regulatory Status

Midwest Body Corporation initially notified under RCRA as a fully regulated generator on August 18, 1980. In 1987 the company switched from an enamel based to a water based paint to cut down on waste generated. During a RCRA Compliance Evaluation Inspection in 1994, the company was classified as a Small Quantity Generator. Hazardous wastestreams generated included waste paint materials. Special (Nonhazardous) wastes included paint sludge, paint booth filters, water soluble parts washer rinsates, welding cooling water and waste oil. A temporary permit was issued effective October 3, 1996 to burn landscape waste that was cleared in conjunction with a site environmental assessment.

Information currently available does not indicate that the site is under the authority of the Atomic Energy Act (AEA), Uranium Mill Tailings Radiation Control Act (UMTRCA), or the Federal Insecticide Fungicide or Rodenticide Act (FIFRA).

2.4 Previous Investigations

In July, 1988 Midwest Body Corporation hired Environmental Risk Consultants to conduct a site evaluation and had them return in June, 1993 to have it updated. In 1989 1,977 linear feet of asbestos-containing pipe insulation was removed. During the 1993

investigation some potential asbestos containing pipe insulation was still present and asbestos was found in floor tiles and roofing. It is not known if this asbestos containing material has been removed.

The Illinois EPA contracted with Graef, Anhalt, Schloemer and Associates, an environmental consulting firm, to conduct a Remedial Investigation (RI) of the property from July through October, 1996. Illinois EPA contracted the firm to conduct the RI because of the long history of manufacturing activities at the site and allegations by former employees of improper disposal of wastes and the onsite burial of paint wastes and drums. Several employees gave depositions to the Illinois State Police that drums containing waste lead paint, paint thinner wastes, paint sludge and paint filters were buried in the western part of the property from 1977 to 1980. Also the city of Paris was interested in developing the property but was reluctant to proceed due to the uncertainty of the extent of onsite contamination.

Activities performed during the RI included 1) the removal and burning of trees and brush from the east and west yards, 2) a geophysical survey of the subsurface to determine potential locations of buried drums, tanks and utility lines, 3) the installation and sampling of monitoring wells both on and offsite to monitor groundwater and determine groundwater flow direction, and 4) the collection of soil/sediment samples and the digging of 135 test pits onsite to locate paint wastes, drums or other contaminants.

The RI identified paint wastes at five locations at various depths up to eight feet. At two locations drum and paint containers were found buried. An analysis of the paint wastes indicated elevated levels of lead, lead, chromium, barium, toluene, xylene and

ethylbenzene. The estimated volume of paint wastes was from 1,000 to 2,000 cubic yards. Contaminated areas were limited to the western parcel south of the railroad spur tracks.

Monitoring well samples did not have any volatile organic compounds (VOC) or semi volatile organic compounds (SVOC) but did have elevated inorganics (lead, iron, manganese, chromium, nickel, thallium, vanadium, beryllium) that exceeded Class 1 Cleanup Objectives. The three sediment/soil samples collected in a drainage ditch showed elevated levels of SVOC's and metals, including benzo (a)pyrene, benzo(b)fluoranthene, indeno (1,2,3-cd) pyrene, arsenic and beryllium.

2.5 Removal Actions

The U.S. EPA conducted a removal action from September 29, 1998 to November 13, 1998. The property was divided into two sections and the removal activities were confined to the western portion, which is an open field west of the manufacturing area. U.S. EPA contracted with Earth Tech to excavate contaminated material from the property. According to the Final Pollution Report from U.S. EPA excavation pits were dug that were larger or roughly matched the delineation of the test pits in the RI report prepared for the Illinois EPA. In addition, areas of contamination that were not identified in the RI were discovered after a discussion with a local resident. Earth Tech excavated approximately 80 test pits which were dug outside the excavated pits to verify the extent of contamination. The test pits were dug at depths of 6 to 12 feet and laboratory results indicated that clean-up criteria for total lead and/or TCLP lead were met within the excavation pits. Approximately 2,565 tons of nonhazardous and 1,615 tons of hazardous wastes were shipped offsite for disposal via rail car to USL City Environmental, Detroit,

Michigan. The excavation pits were backfilled with approximately 3,500 tons of clean material located onsite, and approximately 1,186 tons of backfill material trucked in from offsite.

3.0 Current Site Conditions

3.1 Potential Sources

As mentioned previously a removal action was done on the property in 1998. A site reconnaissance visit was conducted by the Illinois EPA on July 31, 2002 and the area where the removal action took place was covered with tall weeds. The property is flat and there is no apparent offsite drainage pathway. A drive around the perimeter of the site did not reveal any ditches or culverts leading from the property. The USEPA's 1998 removal addressed all known sources that posed a threat to human health and the environment. During a later phone conversation, the USEPA On Scene Coordinator who oversaw the cleanup activities stated that in his judgement, the cleanup activities were complete and thorough.

3.2 Pathway Discussions

3.2.1 Groundwater

The removal action conducted by the U.S. EPA in 1998 addressed all known sources that posed a threat to human health and the environment. According to IEPA Public Water Supply topographic maps, there are no municipal water supplies located within the four mile target distance radius. The use of groundwater is limited to the rural areas around Paris.

3.2.2 Surface Water

The U.S. EPA's removal action conducted in 1998 addressed all sources that could potentially impact surface water in the area surrounding the site. The property has no obvious drainage pathway that flows from the site to surface water. The city of Paris (population 9,016) obtains its drinking water from a surface water intake located approximately three miles north of the site in Twin Lakes. The city supplies 4,115 water connections in its distribution system.

3.2.3 Soil Exposure

The risks for soil exposure were eliminated during the 1998 removal action. The property is relatively isolated and fenced to prevent unauthorized access. The removal area is heavily vegetated and much of the eastern section of the property is either under roof or covered with pavement.

3.2.4 Air Route

All immediate risks for exposure by the air route were eliminated by the U.S. EPA's 1998 removal. The vegetation and covered areas restrict the formation of dust from the soil.

4.0 SITE RECOMMENDATION

The removal action conducted by USEPA in 1998 removed all immediate threats from the buried wastes onsite. The use of groundwater is limited to rural areas. The City of Paris obtains its drinking water from a surface water intake approximately three miles north of the site. The property has no drainage pathway that leads to surface water. The property is relatively isolated and well vegetated and covered with buildings or pavement that restrict exposure via the soil or air exposure pathways. Due to the above

considerations it is recommended that the Midwest Body Corporation site be given a No Further Action status and removed from the CERCLIS database.

Section 5.0 References

RCRA Compliance Evaluation Inspection (CEI) Report Narrative for Midwest Body Corporation, January 26, 1994. IEPA files.

Open Burning Permit for Midwest Body Corporation, issued October 3, 1996. IEPA files.

Update for Environmental Site Evaluation for Midwest Body Corporation.
Environmental Risk Consultants, June 23, 1993.

Final Pollution Report for Midwest Body Corporation. USEPA, January 13, 1999.

Remedial Investigation Report for Midwest Body Corporation. Prepared for IEPA by Graef, Anhalt, Schloemer & Associates, Inc. May 1997.

Illinois Municipal Directory, 1999 – 2000.

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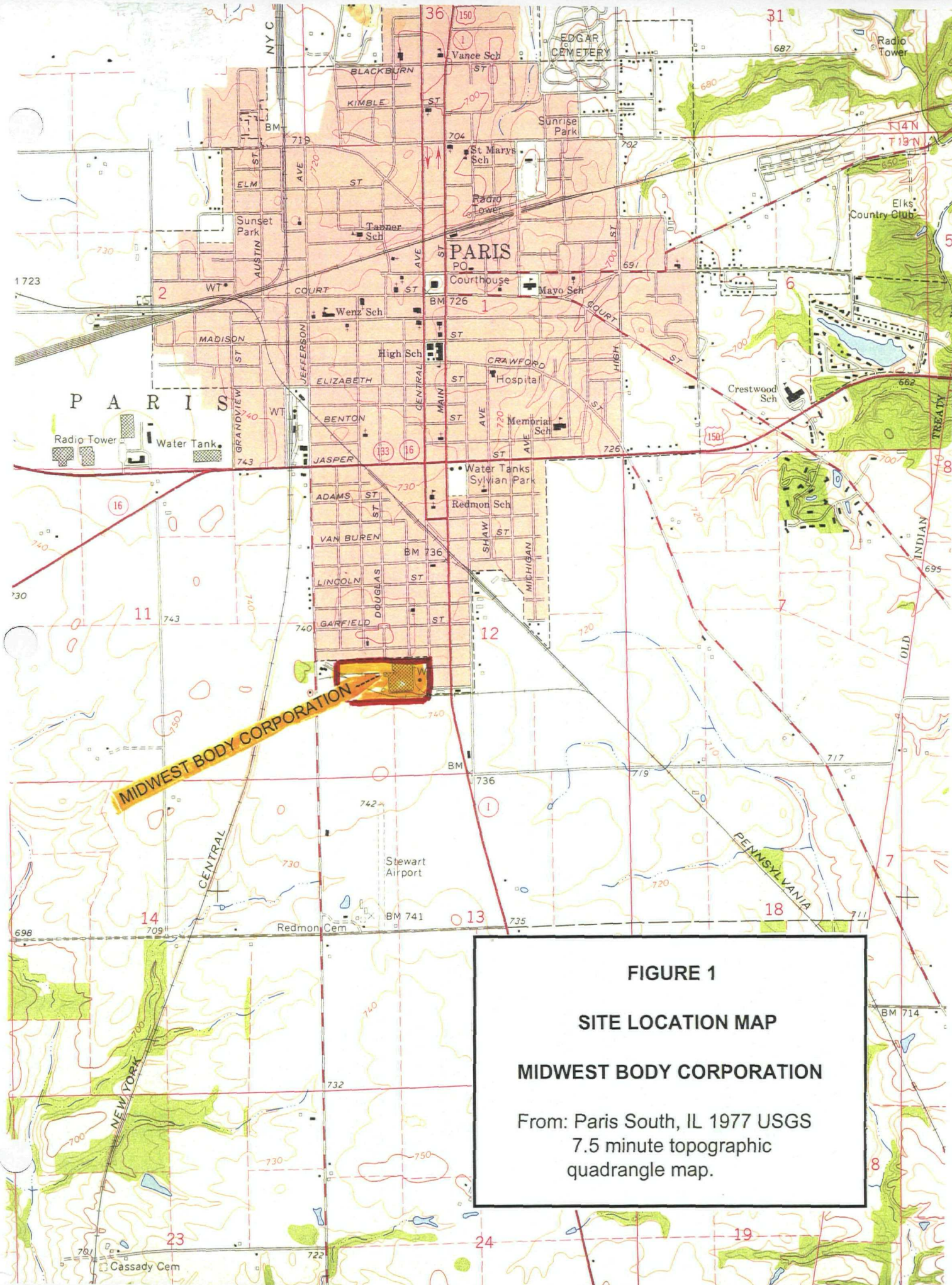
USGS, 1982, Grandview, IL. Quadrangle, 7.5 minute series.

USGS, 1979, Paris North, IL. Quadrangle, 7.5 minute series.

USGS, 1977, Paris South, IL. Quadrangle, 7.5 minute series.

USGS, 1972, Sanford, IL. Quadrangle, 7.5 minute series.

United States Department of the Interior, National Wetlands Inventory Maps for Paris North, IL and Paris South, IL., Quadrangles, 7.5 minute series.



MIDWEST BODY CORPORATION

FIGURE 1

SITE LOCATION MAP

MIDWEST BODY CORPORATION

From: Paris South, IL 1977 USGS
7.5 minute topographic
quadrangle map.